

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of
Telecommunications and Energy on its own
Motion into the Appropriate Pricing, based upon
Total Element Long-Run Incremental Costs, for
Unbundled Network Elements and Combinations
of Unbundled Network Elements, and the
Appropriate Avoided Cost Discount for Verizon
New England, Inc. d/b/a Verizon Massachusetts'
Resale Services in the Commonwealth of
Massachusetts

D.T.E. 01-20

**VERIZON MASSACHUSETTS
FIRST SET OF INFORMATION REQUESTS TO CLEC COALITION**

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA") requests that Allegiance Telecom of Massachusetts, Inc. Covad Communications Company, El Paso networks, LLC and Network Plus, Inc. (collectively the "CLEC Coalition") respond to the following information requests addressed to them or their witnesses. In the event responses to all or part of these requests will not be forthcoming in the time period established for this proceeding by the Department of Telecommunications and Energy ("Department"), kindly notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if the CLEC Coalition, or its witnesses receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If the CLEC Coalition feels that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

DEFINITION AND INSTRUCTIONS

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. In these Information Requests, “CLEC Coalition” means Allegiance Telecom of Massachusetts, Inc. Covad Communications Company, El Paso Networks, LLC and Network Plus, Inc., and their respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

3. “Verizon” means Verizon New England, Inc. d/b/a Verizon Massachusetts.

4. “Document” and “documentation” are used in the broadest sense to mean all writings and records of every type, including without limitation, written, printed, typed or visually reproduced material of any kind, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, photographic records, computer files, whether or not such files are presently in a hard copy form, other data compilation, or any other written recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge of information. “Document” and “documentation” shall also mean copies of documents, notwithstanding that the originals thereof are not in your possession, custody or control, and all attachments to any document.

6. If the CLEC Coalition cannot answer a request in full, answer to the extent possible and state why the CLEC Coalition cannot answer the request in full.

7. If the CLEC Coalition refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

8. Please serve a copy of the responses to these requests on Verizon MA’s attorney, Bruce P. Beausejour, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1. Referring to page 14 of the Ankum testimony, please explain each and every way in which the market value of the CLEC industry over the period of December 31, 1999 through April 23, 2001 affects the long-run incremental costs of Verizon MA?
2. Please provide all documents concerning, referencing, relating to or substantiating the response to Information Request VZ-CC-1.

3. Please provide all documents concerning, referencing, relating to or substantiating the data contained in Exhibit AHA-2.
4. Please provide copies of the following documents referenced at pages 21 and 22 of the Ankum testimony: *The Death of Competitive Telecom?*, *Sitting Pretty: How Baby Bells May Conquer Their World* and “*Telecasm: Can we get to the future from here? First we have to get telecom out of the Stone Age.*”
5. Is it the position of the CLEC Coalition that, prior to 1996, Verizon MA did not install spare capacity for future growth as described at page 27 of the Ankum testimony?
6. Is it the position of the CLEC Coalition that, prior to 1996, Verizon MA’s retail rates did not reflect the costs relating to spare capacity for future growth as described at page 27 of the Ankum testimony?
7. Referring to page 28 of the Ankum testimony, please provide any and all examples in which Verizon MA has offered “cheap, nearly free service” for additional lines to a CLEC customer.
8. Is it the position of the CLEC Coalition that, given the example set forth at page 27-28 of the Ankum testimony, Verizon MA should install 500 loops, and when one of the customers orders an additional service, an individual loop should be installed to serve the order?
9. Please provide all documents concerning, referencing, relating to or substantiating “the fact that there will be no growth” as stated at page 29 of the Ankum testimony.
10. Referring to page 29 of the Ankum testimony, please provide all documents concerning, referencing, relating to or substantiating the “fill factors adopted by the Michigan Public Service Commission.”
11. Referring to page 36 of the Ankum testimony, please provide all documents concerning, referencing, relating to or substantiating that Verizon MA did not build and maintain an efficient network under rate-of-return regulation.
12. Referring to page 36 of the Ankum testimony, when was the last time that Verizon MA, or its predecessors, filed for or was granted a general rate increase under rate-of-return regulation?
13. Referring to page 36, lines 4 through 6 of the Ankum testimony, is it the position of the CLEC Coalition that feeder facilities constructed under a TELRIC analysis will not age?
14. Referring to page 39 of the Ankum testimony, please provide any cost-benefit analysis or other qualitative support that cited testimony of the Verizon MA panel that Verizon MA’s procedures for installing plug-ins in a remote terminal “makes no sense.”
15. Referring to page 49 of the Ankum testimony, is it the position of the CLEC Coalition that Verizon MA currently deploys IDLC for unbundled loops?

16. Please provide each and every example in which IDLC is deployed to provide unbundled loops to CLECs and provide all documents concerning, referencing, relating to or substantiating the example.
17. Please provide all documents concerning, referencing, relating to or substantiating the use of a 6:1 concentration ration referenced at page 57 of the Ankum testimony.
18. Please provide all documents concerning, referencing, relating to or substantiating the statement that the Verizon MA “almost certainly overstates the length of distribution cables” referenced at page 58 of the Ankum testimony.
19. Please provide a copy of Verizon MA’s “engineering guidelines” referenced at page 61 of the Ankum testimony.
20. Referring to page 62 of the Ankum testimony, please provide all documents concerning, referencing, relating to or substantiating the recommendation that Verizon MA “use the same fiber copper cutover point for the Metro zone as it did for the Urban zone.”
21. Referring to page 69 of the Ankum testimony, please provide any cost-benefit analysis or other qualitative support that SONET facilities can be built and maintained on a “just-in-time inventory” basis.
22. Please provide all documents concerning, referencing, relating to or substantiating the recommended utilization factors set forth at pages 73 and 74 of the Ankum testimony.
23. Referring to page 83 of the Ankum testimony, please describe in detail the collocation services offered by so-called collocation hotels
24. How many collocation hotels are located in Massachusetts?
25. Is a collocation hotel the only competitive segment of the collocation industry? If yes, please explain why. If not, please explain why not.
26. Please provide all collocation providers of which the CLEC Coalition is aware that meters DC power to collocated CLECs.
27. Do the members of the CLEC Coalition provide Verizon MA with a yearly forecast of their anticipated collocation requirements per central office and by type? If no, please explain why not.
28. Referring to page 83 of the Ankum testimony, please provide copies of any and all contracts between members of the CLEC Coalition for collocation services offered by so-called collocation hotels.
29. Referring to page 83 of the Ankum testimony, please provide the physical characteristics of collocation space provided by so-called collocation hotels, including but not limited to schematic diagrams, security arrangements, climate controls, electricity services, and interconnection arrangements.

30. Referring to page 83 of the Ankum testimony, please describe in detail the similarities and differences between the collocation services offered by Verizon MA and those offered by so-called collocation hotels.
31. Referring to page 83 of the Ankum testimony, please define the term “monopoly collocation rate.”
32. Referring to page 83 of the Ankum testimony, please provide any and all documentation relating to the costs incurred by so-called collocation hotels to provide collocation services.
33. Please provide all documents concerning, referencing, relating to or substantiating the statement at page 84 of the Ankum testimony that Verizon MA has “systematically overcharge[d] CLECs by leveraging monopoly positions”.
34. Referring to page 84 of the Ankum testimony, is it the CLEC Coalition’s position that Verizon MA charges rates for unbundled network elements that have not been approved by the Department?
35. Referring to pages 86 and 87 of the Ankum testimony, please describe each and every way that the “importance” of collocation to competition affects the costs to provide collocation services.
36. Referring to page 95 of the Ankum testimony, it is stated that “the TELRIC methodology sometimes over-estimates [Verizon MA’s] actual costs...and sometimes it underestimates those actual costs.” Is it the position of the CLEC Coalition that, in the aggregate, the TELRIC methodology over-estimates or under-estimates Verizon MA’s actual costs? Please provide all documents concerning, referencing, relating to or substantiating the response.
37. Referring to page 96 of the Ankum testimony, is it the position of the CLEC Coalition that the exclusion of space conditioning charges is consistent with past Department precedent with regard to TELRIC costs for collocation?
38. Have other state commissions in other jurisdictions found that space conditioning charges are consistent with TELRIC? If yes, please provide the names of all such Commissions and the associated rulings.
39. Referring to pages 97 through 102 of the Ankum testimony, is it the position of the CLEC Coalition that Verizon MA will not incur any incremental space conditioning charges when providing collocation services?
40. Referring to page 102 of the Ankum testimony, on what basis did Dr. Ankum choose 100 square feet to as an average for collocation space?
41. Is it Dr. Ankum’s position that the Space and Conditioning charges are contained in the Land and Building Expense?

42. Referencing Dr. Ankum's statement that Verizon's "space conditioning charges are based on an invalid sample", please calculate:
- a. the probability that a simple random sample of 61 initial collocation applications and 91 subsequent collocation applications, drawn from a universe of 90 initial applications and 759 subsequent applications occurring between Q3/99 and Q4/00, generates a sample containing no initial and no subsequent jobs in which space conditioning work is performed.
 - b. Base the calculations on assuming that 10% - 50% (in increments of 10%) of the initial and subsequent applications in the universes actually require no space conditioning work.
 - c. Please show the results in a 5 x 5 matrix with each cell containing the probability of generating a sample with no initial and no subsequent jobs in which work is performed for each assumed "no work performed" percentage for initial and subsequent jobs.
 - d. Please show all intermediate calculations.
43. Referring to pages 104 through 106 of the Ankum testimony, is it the position of the CLEC Coalition that Verizon MA will not incur any incremental space conditioning charges when providing SCOPE/CCOE collocation services?
44. Referring to pages 111 through 114 of the Ankum testimony, what is the position of Network Plus, Inc. with respect to this portion of the testimony?
45. Referring to page 112 of the Ankum testimony, is it the CLEC Coalition's position that a measuring device is a necessary piece of equipment to charge CLECs for DC power on a drain basis?
46. Referring to page 116 of the Ankum testimony, please provide all supporting documentation in reference to the statement "the power plant is a much simpler piece of equipment than the highly complex central office switch". Provide all components of the power plant, as well as the maintenance, monitoring and oversight required to support a power plant.
47. Please provide all documents concerning, referencing, relating to or substantiating the recommendation at pages 116 and 117 of the Ankum testimony that the ACT for power plants be reduced by 30 percent.
48. Referring to page 118 of the Ankum testimony, please define what is meant by a central office "efficiently configured for collocation." In responding to this question please address: (a) the amount of space set aside to accommodate traditional collocation, SCOPE and CCOE in such a central office; (b) the amount of unused space in a central office that would be set aside to accommodate growth in the amount of collocation space desired; and (c) the difference in the amount of space set aside for collocation in central offices of different sizes.

49. Please provide all documents concerning, referencing, relating to or substantiating the statement that “collocation jobs in offices with above average cable lengths are demonstrably inefficient.”
50. Please provide all documents concerning, referencing, relating to or substantiating the recommendation at page 126 of the Ankum testimony that the ACT for power cables be reduced by 30 percent.
51. Referring to pages 127 and 128 of the Ankum testimony, is it the position of the CLEC Coalition that the only expenses incurred by Verizon MA to determine whether space is available in a central office for collocation is the cost of “creating and maintaining central office records?”
52. Referring to pages 132 through 135 of the Ankum testimony, is it the position of the CLEC Coalition that providing collocation space in a central office should be less expensive than providing collocation space in a “collocation hotel?”
53. Referring to page 137 of the Ankum testimony, please provide the names, addresses and data received from the referenced real estate agents.
54. Referring to page 141 of the Ankum testimony, what security charges does Verizon MA incur with respect to space that is not accessible to anyone other than Verizon MA personnel? Please provide all documents concerning, referencing, relating to or substantiating this response.
55. Please provide all documents concerning, referencing, relating to or substantiating the recommendation at page 143 of the Ankum testimony that the ACT for collocation security be reduced by 50 percent.
56. Please provide the worksheets, all calculation, invoices, and documentation to support the Application Fee and Engineering and Administration Fee on AHA Exhibit-4.
57. Using Verizon MA workpapers Part CA, WP 1.0, 1.1, 1.2, 1.3, and 1.4 as a template, please provide the hours required to support the each work activity that results in the associated time referenced on AHA Exhibit-4. If Dr. Ankum does not think the task or activity is required, please provide documentation to support such claim.
58. Referring to page 3 of the Morrison testimony, please describe Mr. Morrison’s responsibilities related to training new engineers for US West Collocation efforts. Also, specify the job responsibilities of the engineers and the work functions performed in provisioning collocation arrangements in US West.
59. Referring to page 4 of the Morrison testimony, do the members of the CLEC Coalition utilize the services of any collocation hotel? If yes, please provide the number of locations by state and the associated examples of all rates the CLEC Coalition pays to be located in that type of arrangement. If no, please explain why not.

60. Referring to page 4 of the Morrison testimony and SLM Exhibit-2, please explain why cross connect costs for DS0, DS1, DS3s, and OC are not included in the Universal Access rates.
61. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access' monthly DC power per amp cost include emergency back up?
62. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, is the Universal Access DC power per amp cost based on "load" or "fused"?
63. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does the Universal Access DC power per amp cost of \$15.00 per amp reflected on Page 3 of the Exhibit reflect costs for the power cable only?
64. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, is the Universal Access DC power per amp cost for one feed only?
65. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does the CLEC pay Universal Access any AC costs or for HVAC?
66. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, the rate element Power Distribution for Verizon MA reflects a quantity of "2", yet for Universal Access the quantity is reflected as "1". Please explain the difference in the number of cables.
67. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access charge for conduit rental from outside its building to its interior? If so what is the rate and how is it assessed?
68. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access not charge for any form of security including but not limited to access at its doors?
69. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access allow the CLEC allowed to install its own equipment or must it utilize an approved vendor from the equipment list?
70. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access permit the CLEC 24 x 7 access without any prior notification or escort?
71. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access charge for cable racking for the fiber optic cable?
72. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access require all CLEC equipment to be located in a cabinet?
73. Referring to SLM Exhibit-2, is it Mr. Morrison's contention that in a 100 square foot area a CLEC places eight cabinets, all of which "Universal provides each cabinet with 12 strands of fiber"?

74. Referring to SLM Exhibit-2, if a 100 square foot area is equivalent to approximately eight, 30"x 30" x 7' cabinets as referenced on Page 3 of the Exhibit, what is the basis for Mr. Morrison's use of the cost of five cabinets in Exhibit-2?
75. Referring to page 5 of the Morrison testimony and SLM Exhibit-2, does Universal Access not allow access to voice grade circuits?
76. Referring to SLM Exhibit-2, please explain the notation "\$35 MRR, \$75 NRC per connection."
77. Referring to page 5 of the Morrison testimony, were any of the CLECs in the CLEC Coalition consulted in developing the space configuration used in Mr. Morrison's study? If yes, please provide supporting documentation that the assumptions used in the space configuration of the study accurately reflect what a CLEC in the CLEC Coalition would install at a collocation hotel to efficiently use 100 square feet of space. If no, please explain how this is representative of what a CLEC would deploy at either a collocation hotel or a Verizon MA central office.
78. Referring to page 5 of the Morrison testimony, does Universal Access require a minimum amount of collocation space? If yes, please provide that amount.
79. Referring to page 5 of the Morrison testimony, does Universal Access provide any cross connects for CLEC use? If no, are all cross connects the responsibility of the CLEC or its vendor?
80. Has Mr. Morrison visited a collocation site in Verizon MA's central offices? If yes, provide the location(s).
81. Referring to page 5 of the Morrison testimony, do collocators at Universal Access install their own distribution frames, i.e., POT bay terminations?
82. What party is responsible for installing conduit/innerduct and the associated cabling from outside the collocation hotel to the collocator's equipment located inside the building?
83. How is the charge for cable racking assessed in the collocation hotel rates?
84. Referring to Exhibit SLM-2 on Page 2 of 3, please identify what the \$2500 NRC fee at Column M, Line 15 reflects.
85. Referring to page 6 of the Morrison testimony, Referring to, please provide supporting documentation used in developing the physical collocation space configuration used for the study to support "an efficient utilization of the 100 square feet of equipment". The documentation should include, but not be limited to: (a) equipment used to provide 84 DS1 circuits, the dimensions of the equipment, and the associated DC power requirements; (b) equipment used to provide 24 DS3 circuits, the dimensions of the equipment, and the associated DC power requirements; (c) equipment used to provide 2000 DS0 circuits, the dimensions of the equipment, and the associated DC power requirements; (d) manufacturer specifications of equipment identified in a-c above; and

- (e) identify the total relay rack space required to support the equipment listed in a-c above.
86. Referring to page 7, line 11, please provide copies of all proprietary responses.
 87. Please provide all documents concerning, referencing, relating to the services provided by Universal Access referenced at page 7 of the Morrison testimony.
 88. Referring to the Morrison testimony at pages 6 and 7, (a) what is the address of Universal Access? (b) what collocation services does Universal Access provide? (c) what is the physical configuration of the Universal Access facility? (d) does the Universal Access facility provide any services other than collocation services? (e) please provide the client list and list of approved equipment vendors of Universal Access; (f) please provide the basis for the statement that “one would presume that the cost of providing collocation for the independent collocation provide is roughly similar to, if not somewhat higher than, [Verizon MA’s] costs; and (g) what are the costs incurred by Universal Access to provide collocation services?
 89. Referring to page 8 of the Morrison testimony, why must a CLEC be collocated in a Verizon MA central office to gain access to the Company’s unbundled loops or interconnect to any other Verizon MA provided UNEs?
 90. Referring to pages 10 and 11 of the Morrison testimony, provide a detailed description, with time estimates, of the tasks necessary to determine whether collocation space is available in a central office.
 91. Referring to page 11, please provide any studies or documentation that supports the statement: “[t]hese excessive estimates of the amount of hours involved in checking on the feasibility and availability of collocation space does not comport with my experience”. If no studies or documentation exists, please provide the basis for Mr. Morrison’s statement along with a breakdown of all tasks and associated times for the various administrative and engineering tasks and hours that Mr. Morrison thinks is appropriate for providing collocation using Verizon MA’s template as a model.
 92. Referring to page 3 of the Fischer testimony, please define the term “make-whole provision” as it is used at line 8.
 93. Referring to page 11 of the Morrison testimony, that “it surely does not comport with my experience,” please provide Mr. Morrison’s experience in conducting site survey and other investigations for collocation space availability, along with the number of offices he provided collocation, the sizes of the offices and the state they were located in, the number of collocators in the office, and the time frame he performed these functions.
 94. Referring to page 12 of the Morrison testimony, please provide all documents concerning, referencing, relating to or substantiating the basis of the statement that “[t]his means that the collocation spaces – particularly where it concerns a central office that already accommodates collocators – can be planned with only a minimal amount of time and effort”.

95. Referring to page 6 of the Fischer testimony, please provide the basis for using the weighted cost of capital recommended by AT&T's witness for modifying Verizon MA's ACFs.
96. Referring to page 6 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the basis for using the weighted cost of capital recommended by AT&T's witness for modifying Verizon MA's ACFs.
97. Referring to page 6 of the Fischer testimony, is Mr. Fischer's testimony regarding the appropriate weighted cost of capital being offered as expert opinion on the subject? If the answer is anything other than an unconditional "no", please provide: (a) all documents concerning, referencing, relating to or substantiating Mr. Fischer's expertise on this subject; and (b) copies of all written testimony and transcripts of Mr. Fischer's testimony on cost of capital in any judicial or administrative proceeding.
98. Referring to page 6 of the Fischer testimony, please provide the basis for using the depreciation lives recommended by AT&T's witness for modifying Verizon MA's ACFs.
99. Referring to page 6 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the basis for using the depreciation lives recommended by AT&T's witness for modifying Verizon MA's ACFs.
100. Referring to page 6 of the Fischer testimony, is Mr. Fischer's testimony regarding the appropriate depreciation lives offered as expert opinion on the subject? If the answer is anything other than an unconditional "no", please provide (a) all documents concerning, referencing, relating to or substantiating Mr. Fischer's expertise on this subject; and (b) copies of all written testimony and transcripts of Mr. Fischer's testimony on cost of capital in any judicial or administrative proceeding.
101. Referring to pages 7 and 8 of the Fischer testimony, in what year was the FCC's last represetation of Verizon MA's depreciation rates?
102. Referring to pages 7 and 8 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the depreciation rates used by each member of the CLEC Coalition for financial reporting, regulatory or any other purpose.
103. Referring to page 8 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the source and calculation of each data input of WRF Exhibit 3.
104. Referring to page 18 of the Fischer testimony, please provide documents concerning, referencing, relating to or substantiating the source and calculation of each data input of WRF Exhibit 4.
105. Referring to page 30 of the Fischer testimony, is it the position of the CLEC Coalition that a forward-looking, most efficient network" would not require upgrades? If the answer is anything other than an unconditional "yes", please provide the basis for the

answer and all documents concerning, referencing, relating to or substantiating the response.

106. Referring to pages 32 through 34 of the Fischer testimony, is it the position of the CLEC Coalition that Verizon MA has not and will not incur wholesale advertising costs?
107. Referring to pages 32 through 34 of the Fischer testimony, is it the position of the CLEC Coalition that before the advent of competition, regulated service providers in the then-monopoly telecommunications, electric or gas industries did not advertise to retail customers?
108. Referring to page 35 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the statement that “[a]s direct expenses decline, however, so do indirect expenses such as overhead.”
109. Referring to page 36 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the statement that “[a]s telecommunications providers upgrade their networks and make them more efficient, there is less need for the same number of employees to oversee the network.”
110. Referring to pages 35 and 36 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the change in the level of overhead to be incurred by Verizon MA for (a) its existing network; and (b) a forward-looking network.
111. Referring to page 37 of the Fischer testimony, please provide all documents concerning, referencing, relating to or substantiating the statement that all Verizon MA legal, lobbying and regulatory efforts “are in fact expended for the benefit of Verizon-MA’s retail offerings.”
112. Referring to page 9 of the Stacy testimony, is it the position of the CLEC Coalition that the tasks associated with non-recurring costs vary between Verizon service territories? If the answer is anything other than an unqualified “no”, please provide all documents concerning, referencing, relating to or substantiating the response.
113. Referring to page 9 of the Stacy testimony, please describe in detail and with specificity any and all factors that would result in varying work times between Verizon service territories to perform the same tasks associated with non-recurring costs. Please provide all documents concerning, referencing, relating to or substantiating this response.
114. Referring to page 11 of the Stacy testimony, please describe in detail and with specificity any and all factors and assumptions relating to the statement that 30.79 minutes of travel time doesn’t “appear to make sense from a real world standpoint.”
115. Referring to pages 13 and 14 of the Stacy testimony, please provide all documents concerning, referencing, relating to or substantiating that lower than average time estimates reflect “more efficient times.”

116. Referring to page 18 of the Stacy testimony, please provide: (a) each and every instance in which Verizon MA's NRCM incorporates "excessive fallout"; (b) for each instance identified in (a) above, state the appropriate fallout rate that should be applied; (c) for each fallout rate stated in (b) above, describe in detail and with specificity all factors and assumptions supporting the fallout rate, including, but not limited to any changes in technologies and the effect of any such changes on the fallout rate; and (d) for each fallout rate stated in (b) above, provide all documents concerning, referencing, relating to or substantiating the fallout rate.
117. Referring to page 22 of the Stacy testimony, is it the position of the CLEC Coalition that any mechanized intervention assumed in the NRCM represents a "fallout problem" that "is an indicator or inefficient processes"?
118. Referring to page 23 of the Stacy testimony, please provide any relevant precedent in Massachusetts relating to whether recovering disconnection costs as a non-recurring cost element, and state whether that precedent is consistent with the Stacy testimony.
119. Referring to pages 27 through 42 of the Stacy testimony, is it the position of the CLEC Coalition that Verizon MA does not and will not incur loop qualification and conditioning costs to provide CLECs with loops capable of providing DSL service?
120. Referring to page 39 of the Stacy testimony, is it the position of the CLEC Coalition that, on average, Verizon MA's costs to provision loops to CLECs is below its average TELRIC cost? If the answer is anything other than an unqualified "no", please provide all documents concerning, referencing, relating to or substantiating the response.
121. Referring to page 40 of the Stacy testimony, please provide citations and copies of any state commission orders, rulings or approvals that permit loop conditioning charges.
122. Referring to page 42 of the Stacy testimony, please provide the basis for the statement that Verizon MA's non-recurring costs "for loop conditioning reflect inefficient network management." Please provide all documents concerning, referencing, relating to or substantiating the response.